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Attorneys for Defendant
SMITH'S FOOD & DRUG CENTERS, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Victoria Rose, an individual,
Plaintiff

v.
Smith's Food & Drug Centers, Inc., a foreign corporation; DOES 1 through 10; and ROE CORPORATIONS 11 through 20, inclusive.

Case No. 2:24-cv-00273-JAD-DJA

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR DEFENDANT
TO FILE A RESPONSE TO
PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT**

(FIRST REQUEST)

WHEREAS, due to the intervening holidays and conflicts in the schedule of Defense Counsel it has become necessary for Defense Counsel to seek an extension to file a response to Plaintiff's Motion for Summary Judgment (ECF No. 14) filed on December 19, 2024; and

WHEREAS, Plaintiff's Counsel has agreed to extend the date for Defendant to respond to the Motion for Summary Judgment from its current due date of January 9, 2025 until January 16, 2025;

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1 IT IS HEREBY STIPULATED AND AGREED by and between Defendant, SMITH'S
2 FOOD & DRUG CENTERS, INC., by and through its counsel, JERRY S. BUSBY, ESQ., of the law
3 firm COOPER LEVENSON, P.A., and Plaintiff VICTORIA ROSE, by and through her counsel,
4 MICHAEL T. NIXON, ESQ. of LADAH LAW FIRM that the date for Defendant to file its response
5 to Plaintiff's Motion for Summary Judgment be extended from January 9, 2025 until **January 16,**
6 **2025.**

7 Respectfully submitted this 9th day of January, 2025.

8 LADAH LAW FIRM

COOPER LEVENSON, P.A.

9 /s/ Michael T. Nixon
10 MICHAEL T. NIXON, ESQ.
Nevada Bar No. 012839
11 517 South Third Street
Las Vegas, NV 89101
(702) 291-8007
12 Attorneys for Plaintiff
VICTORIA ROSE

13 /s/ Jerry S. Busby
JERRY S. BUSBY, ESQ.
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Las Vegas, NV 89102
(702) 366-1125
14 Attorneys for Defendant
SMITH'S FOOD & DRUG CENTERS, INC.

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16 IT IS SO ORDERED:

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19 UNITED STATES DISTRICT COURT JUDGE
DATED: January 9, 2025